BAKER & HOSTETLER LLP

45 Rockefeller Plaza

New York, NY 10111

Telephone: (212) 589-4200 Facsimile: (212) 589-4201

David J. Sheehan Nicholas J. Cremona Fernando A. Bohorquez, Jr.

Attorneys for Irving H. Picard, Trustee for the Substantively Consolidated SIPA Liquidation of Bernard L. Madoff Investment Securities LLC

and for the Estate of Bernard L. Madoff

UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

SECURITIES INVESTOR PROTECTION CORPORATION,

Plaintiff,

v.

BERNARD L. MADOFF INVESTMENT SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Substantively Consolidated SIPA Liquidation of Bernard L. Madoff Investment Securities LLC and Bernard L. Madoff,

Plaintiff,

v.

BENJAMIN T. HELLER,

Defendant.

Adv. Pro. No. 08-01789 (SMB)

SIPA Liquidation

(Substantively Consolidated)

Adv. Pro. No. 10-04367 (SMB)

CASE MANAGEMENT NOTICE

PLEASE TAKE NOTICE, that pursuant to the Order (1) Establishing Litigation Case Management Procedures for Avoidance Actions and (2) Amending the February 16, 2010 Protective Order (the "Order") [Dkt. No. 3141] entered by the Bankruptcy Court in the above captioned SIPA liquidation, Adv. Pro. No. 08-01789 (SMB), on November 10, 2010, the following deadlines are hereby made applicable to this adversary proceeding:

- 1. The Initial Disclosures shall be due: December 21, 2015.
- 2. Fact Discovery shall be completed by: July 18, 2016.
- 3. The Disclosure of Case-in-Chief Experts shall be due: September 30, 2016.
- 4. The Disclosure of Rebuttal Experts shall be due: December 1, 2016.
- 5. The Deadline for Completion of Expert Discovery shall be: December 30, 2016.
- 6. The Deadline for Service of a Notice of Mediation Referral shall be: On or before January 6, 2017.
- 7. The Deadline to Choose a Mediator and File a Notice of Mediator Selection shall be: On or before January 20, 2017.
- 8. The Deadline for Conclusion of Mediation shall be: On or before May 22, 2017.

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Dated: New York, New York October 1, 2015

BAKER & HOSTETLER LLP

By: /s/ Nicholas J. Cremona
David J. Sheehan
Nicholas J. Cremona
Fernando A. Bohorquez, Jr.
45 Rockefeller Plaza
New York, NY 10111
Telephone: (212) 589-4200

Facsimile: (212) 589-4201

Attorneys for Irving H. Picard, Trustee

for the Substantively Consolidated SIPA Liquidation of Bernard L. Madoff Investment Securities LLC and for the Estate of Bernard L. Madoff